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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

TARA DUGGAN, et al.,

Plaintiffs,

v.

TRI-UNION SEAFOODS, LLC,

Defendant.

Case No. 4:19-cv-02562-WHO

**STIPULATION OF DISMISSAL OF
PLAINTIFF TARA DUGGAN**

Hon. William H. Orrick

Pursuant to Federal Rule of Civil Procedure, Rules 41(a)(1)(A)(ii), Plaintiffs Tara Duggan, Lori Myers, Angela Cosgrove, Robert McQuade, Colleen McQuade, Anthony Luciano, Lori Luciano, Robert Nugent, James Borruso, Fidel Jamelo, Jocelyn Jamelo, Ken Petrovcik, Avraham Isac Zelig, Amar Mody, Heena Mody, and Megan Kiihne and Defendant Tri-Union Seafoods, LLC dba Chicken of the Sea International, Inc. ("COSI" and collectively with Plaintiffs, the "Parties"), hereby STIPULATE AS FOLLOWS:

WHEREAS, Plaintiff Tara Duggan hereby voluntarily dismisses her claims against Defendant in the above-captioned action;

WHEREAS, the Parties have met and conferred and Defendant does not object to the dismissal of Plaintiff Duggan's claims in this action; and

WHEREAS, because counsel for the putative classes represents that the rights of the absent putative class members will not be affected by the dismissal of Plaintiff Duggan and will continue to be represented by the remaining named Plaintiffs, and specific to the putative California class, by Plaintiff Myers, the absent putative class members will suffer no prejudice as a result of this dismissal;

NOW, THEREFORE IN CONSIDERATION OF THE FOREGOING IT IS HEREBY STIPULATED by and between the Parties that pursuant to Federal Rule of Civil Procedure, Rules 41(a)(1)(A)(ii), Plaintiff Duggan's individual claims against Defendant in this action are voluntarily dismissed. Plaintiff Duggan's dismissal is without prejudice and will not preclude her ability to participate as a member of the putative Class, and without prejudice as to the remaining Plaintiffs' claims and the claims of the putative Class.

IT IS SO STIPULATED.

Dated: September 27, 2021 BONNETT, FAIRBOURN, FRIEDMAN & BALINT, P.C.

/s/Patricia N. Syverson

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Dated: September 27, 2021 PARKS & SOLAR, LLP

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Dated: September 27, 2021 VENABLE, LLP

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Attorneys for Defendant, COSI Seafoods, LLC

LOCAL RULE 5-1(i)(3) ATTESTATION

Pursuant to Local Rule 5-1(i)(3), I attest that all other signatories listed, and on whose behalf the filing is submitted, concur in the filing of this Stipulation of Dismissal, and have authorized the filing of this Stipulation of Dismissal.

Dated: September 27, 2021

By: /s/ Patricia N. Syverson
Patricia N. Syverson

CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2021, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the e-mail addresses denoted on the Electronic Mail notice list, and I hereby certify that I have mailed the foregoing document or paper via the United States Postal Service to the non-CM/ECF participants indicated on the Manual Notice list.

I certify under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on September 27, 2021.

/s/ Patricia N. Syverson
Patricia N. Syverson